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December 9, 1999

Ms. Magalie Salas
Secretary,
Federal Communications Commission
445 12th Street, S.W.
Street Lobby – TW A235
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Dear Ms. Salas:

Re: *Computer III Remand Proceedings Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards*, CC Docket No. 90-623 / *Filing and Review of Open Network Architecture Plans*, CC Docket No. 88-2, Phase I

In the *Computer III* and *ONA* proceedings, the Commission granted Pacific Bell and Nevada Bell waivers of the *ONA* state tariffing requirement for the complementary network service ("CNS") Dual Telephone Coverage (Call Forwarding To Multiple Locations), which Pacific Bell and Nevada Bell had included in their 1989 *ONA* Plan amendment.¹ Pacific Bell's waiver will expire on December 15, 1999, and Nevada Bell's waiver will expire on December 15, 2000.

By this letter, Pacific Bell and Nevada Bell are notifying the Commission that they no longer require these waivers. In reviewing their 1989 *ONA* Plan Amendment and the individual types of state-tariffed call forwarding services that Pacific Bell and Nevada Bell offer,² Pacific Bell and Nevada Bell have determined that they provide under state tariffs what they described in their 1989 *ONA* Plan Amendment. Therefore, no waivers are needed, as further explained below.

Pacific Bell's and Nevada Bell's sole description of Dual Telephone Coverage in their 1989 *ONA* Plan Amendment (Appendix AA-2) was as follows: "This capability allows a subscriber/user to selectively redirect calls arriving at his/her station set to two (and sometimes more than two) different answering points including multiple messaging services based on specific call situations."

¹ *Pacific Bell and Nevada Bell Petition for Extension s of Waiver*, CC Docket Nos. 88-2, Phase I and 90-623, Order, 13 FCC Rcd 10260 (1998). The FCC granted the original waivers in *Pacific Bell and Nevada Bell Notice and Petition for Removal of the Structural Separation Requirement and Waiver of Certain Federal and State Tariffing Requirements*, CC Docket Nos. 90-623, 88-2, Phase I, DA 93-587, *Memorandum Opinion and Order*, 8 FCC Rcd 3982, para. 11 (1993).

² Customers may purchase these services and feature s in various combinations.

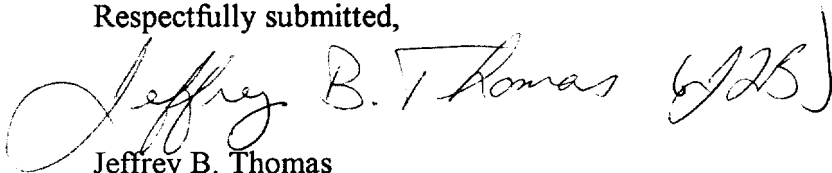
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The capability of redirecting calls to two or more answering points exists for many call situations by combining existing Pacific Bell and Nevada Bell services which are variations of Call Forwarding or Hunting.³ For instance, a customer can have his or her calls forwarded to one number using Call Forwarding Service. That same customer can select up to 10 specific numbers for which calls are to be forwarded to a different number using Select Call Forwarding Service. That same customer can then dial in at any time (24 hours a day, seven days a week) and redirect his or her Call Forwarding Service to yet another number, without affecting the destination of the calls that were designated to be forwarded subject to Select Call Forwarding Service.

Accordingly, a customer can selectively redirect calls to two or more destinations. Or, in the words of Pacific Bell's and Nevada Bell's 1989 ONA Plan Amendment, "[t]his capability allows a subscriber/user to selectively redirect calls arriving at his/her station set to two (and sometimes more than two) different answering points." Moreover, just as described in the 1989 ONA Plan Amendment, this redirection of calls can include "multiple messaging services based on specific call situations." For instance, the call situation of busy or no answer can be the basis for one call redirection service, while the call situation of being from a specific number selected as part of a group of numbers up to ten, can be the basis for another call redirection service. In this manner, call forwarding can be to multiple locations and Dual Telephone Coverage, as described in Pacific Bell's and Nevada Bell's 1989 ONA Plan Amendment, is achieved.

Therefore, Pacific Bell and Nevada Bell are providing services under state tariffs that meet the description of Dual Telephone Coverage in their 1989 ONA Plan Amendment. For this reason, Pacific Bell and Nevada Bell do not need waivers of the ONA state tariffing requirement for the CNS Dual Telephone Coverage included in their 1989 ONA Plan Amendment. If you have any questions, please contact Jay Bennett at (202) 326-8889.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jeffrey B. Thomas" followed by a stylized set of initials "JTB".

Jeffrey B. Thomas
Attorney for SBC Communications Inc.,
And its Subsidiaries Pacific Bell and Nevada Bell

cc: Ann Stevens, Common Carrier Bureau

³ These services include (1) Call Forwarding; (2) Select Call Forwarding; (3) Call Forwarding-Variable (Remote Access to Call Forwarding); (4) Forwarded Call Information - Multiple Users; (5) Forwarded Call Information - non-Centrex; (6) Busy Call Forwarding; (7) Call Forwarding Don't Answer; and (8) Call Forwarding Busy Line/Don't Answer.